



Partners
Dawn M. Cardi
Chad L. Edgar

Associates
Jessica Friedrich
Joanna C. Kahan

Of counsel
Diane Ferrone

September 27, 2021

Via ECF

Hon. George B. Daniels
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: SEP 28 2021

Re: United States v. Markell Bobian, et al., 3:20-cr-57-10 (GBD)

Your Honor:

I am CJA counsel to defendant Markell Bobian. I write, with the consent of the Government, to respectfully request an additional two-week extension of time to file any objections to the presentence report.

The Court previously granted our request for an extension of time to file any objections to the presentence report and the current due date is September 27, 2021. Mr. Bobian's sentencing date is November 17, 2021.

The parties continue to engage in discussions about certain information in the first draft of the presentence report. Both parties are optimistic that with additional time any potential issues can be resolved.

Accordingly, we respectfully request that any objections to the presentence report be adjourned to October 12, 2021.

Respectfully submitted,

/s/

Dawn M. Cardi

CC: All Parties (via ECF)
U.S. Probation Officer Christopher Pagano (via E-mail)